Remarks

Allowance of all claims is respectfully requested. With entrance of this amendment, claims 1-3, 5-9, 11-14, 16-19, 21-24, 26 & 27 remain pending.

Initially, claims 18, 19, 21-24, 26 & 27 are amended herein to address the 35 U.S.C. §101 rejection stated in the Office Action. Specifically, each of these claims adopts the Examiner's suggestion of embodying the program on "computer-readable medium" in order to state the claim in a statutory form. In view of these amendments, Applicants respectfully request reconsideration and withdrawal of the 35 U.S.C. §101 rejection to pending claims 18, 19, 21-24, 26 & 27.

By this paper, independent claims 1, 13, 18 & 23 are amended to specify the subject matter of canceled dependent claims 4, 15 & 25. Specifically, each claim is amended to recite that the template processing module includes a component to generate a first Document Object Model tree for navigating the template module, and a second Document Object Model tree for navigating the source data model. Since support for the amended language can be found in canceled dependent claims 4, 15 & 25, and thus, no new matter is added to the application by the amendments presented.

In the Office Action, claims 1-27 were rejected under 35 U.S.C. §103(a) as being unpatentable over Raman (U.S. Patent No. 5,748,186; hereinafter Raman) in view of Batres (U.S. Patent Publication No. 2005/0102608 A1; hereinafter Batres). This rejection is respectfully, but most strenuously, traversed to any extent deemed applicable to the claims presented herewith and reconsideration thereof is requested.

Applicants recite in the independent claims a mechanism for manipulating information from a source data model and creating a target data model. As one example, reference the following FIG. 1 from the application.

Figure 1
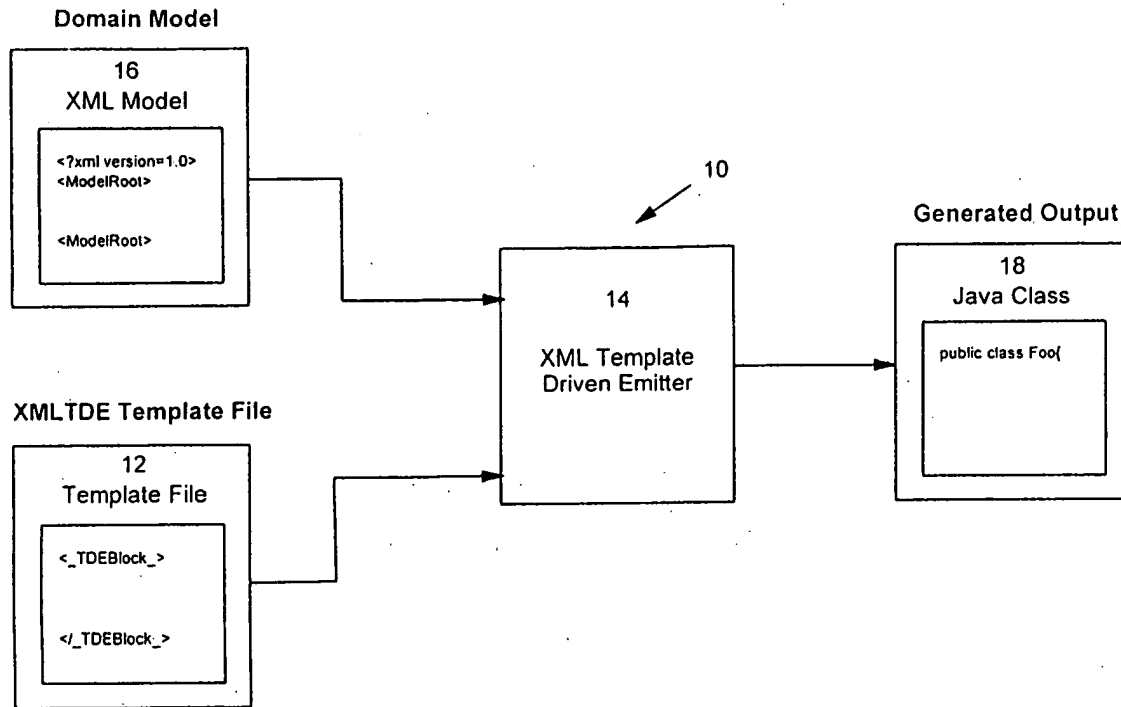
The mechanism is indicated generally by reference 10 and comprises a template file or module 12 and a template driven emitter or template processing module 14. As will be described in more detail below, the template driven emitter 14 applies the template file 12 to a domain model 16 to produce a generated output file 18. In the context of the present invention, the domain model 16 comprises a source data model and the generated output file 18 comprises a target data model. The source data model 16 contains read-only data which is extracted by the mechanism 10 and used to generate a formatted output, i.e., the target data model 18. (See page 8, lines 10-21 of the specification.)

More particularly, Applicants claim a technique for manipulating information from a source data model and creating a target data model (e.g., claims 1, 13, 18 & 23). The technique includes: a template module including a directive to extract and manipulate selected data of a source data model, the source data model comprising read-only data; a template processing module to process the directive contained in the template module; and wherein the template processing module further includes a component to generate a first Document Object Model tree

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for navigating the template module to manipulate the source data model <u>and</u> create a target data model, and a component to generate a second Document Object Model tree for navigating the source data model. Thus, in Applicants' claimed invention:

(1)   Information from a source data model is manipulated *to create a target data model*.

(2)   A *template module* is provided which includes a directive to extract and manipulate selected data of the source data model, wherein the source data model is read-only data.

(3)   A template processing module is further provided to process the directive contained in the template module.

(4)   The template processing module includes a component to generate a first Document Object Model tree *for navigating the template module to manipulate the source data model and create a target data model*, and a component to generate a second Document Object Model tree *for navigating the source data model*.

Applicants respectfully submit that numerous aspects of the above-summarized features of their independent claims are not taught or suggested by the applied art.

Applicants request reconsideration and withdrawal of the obviousness rejection on the following grounds: (1) the Office Action fails to state a *prima facie* case of obviousness against Applicants' claimed invention; (2) the Office Action has misinterpreted the teachings of the Raman patent, thus voiding the basis for the rejection; (3) the justification for modifying the Raman patent is deficient; (4) the Raman patent itself lacks any teaching, suggestion or incentive for its modification; and (5) the stated rejection is a hindsight reconstruction of the claimed invention using Applicants' own disclosed subject matter.

Lack of a *Prima Facie* Case of Obviousness:

Initially, Applicants note that the Office Action fails to indicate a teaching or suggestion in Raman which sets forth a mechanism for manipulating information from a source data model *to create a target data model*. Further, Applicants respectfully submit that no such mechanism is described by Raman. The Raman patent is directed to a computer system for facilitating interactive presentation of electronically encoded multi-media information. That is, Raman

teaches techniques <u>for rendering</u> multi-media information. Raman describes a facility for a user to interactively and independently control the receiving of information and the presentation of information in a plurality of presentation modalities. Audio, visual and tactile renderings are described. Applicants respectfully submit that one of ordinary skill in the art would not read Raman as teaching a mechanism for manipulating information from a source data model to create a target data model. Again, the Office Action makes no mention of Applicants' recited concept of creating a target data model, and thus, fails to state a *prima facie* case of obviousness based on Raman. Clearly, based on Applicants' independent claims, the source data model and the target data model comprise distinct models within the claimed invention.

Still further, the Office Action fails to state a *prima facie* case with respect to Applicants' characterization that the "template processing module further includes a component to generate a first Document Object Model tree *for navigating the template module to manipulate the source data model and create a target data model.*" In rejecting this subject matter, the Office Action States:

> The Examiner believes Raman suggests the generation of a similar Document Object Model, however, the reference fails to explicitly state a Document Object Model tree for navigating the template file. Batres generates a DOM and utilizes said DOM for enumerates through the DOM elements to determine whether the displayable DOM elements are to be shown or hidden on the selected page. See Batres, page 6 [0061 through 0062].

This rationale for rejecting Applicants' recited facility is believed clearly deficient. Applicants do not claim to be the first to create a DOM tree *per se*. Without acquiescing to the characterizations or the citability of Batres against the claims at issue, this is essentially the reason the Examiner is citing the Batres patent, i.e., that it allegedly teaches or suggests a DOM tree. However, the claims at issue recite particular processing employing a DOM tree. Again, the particular processing of Applicants' invention is the provision of a template processing module that includes a component to generate a first Document Object Model tree *for navigating the template module to manipulate the source data model and create a target data model.* No such facility is taught or suggested by Batres or Raman, either alone or in combination.

Further, the Office Action lacks any explanation of why the particular facility recited by Applicants would have been obvious to one of ordinary skill in the art. That is, the Office Action does not explain why it would have been obvious to have a component in the template processing module for generating a first Document Object Model tree *for navigating the template module to manipulate the source data model and create a target data model*, as recited in the independent claims. For at least this reason, reconsideration and withdrawal of the obviousness rejection stated in the Office Action is requested.

Yet further, Applicants respectfully submit that the Office Action fails to state a *prima facie* case of obviousness with respect to Applicants' characterization that the "template processing module further includes ... a component to generate a second Document Object Model tree *for navigating the source data model*." In rejecting this subject matter of original dependent claims 4, 15 & 25, the Office Action states:

> Preferred methods which can operate during the rendering of a document include public, positional, location, navigational, marking event, browsing, rendering, and link methods. These methods provide a suggestion of components, which manipulate the document object and navigate said elements within the document object. See column 6, lines 36-56.

Even accepting the Office Action's characterization of Raman with respect to the preferred methods, it is noted that the characterization does not address the language at issue. Specifically, Applicants recite a second Document Object Model tree. There is no discussion in the rationale for rejecting the subject matter of a second Document Object Model tree *per se*. Further, there is no discussion in the rejection of a second Document Object Model tree *for navigating the source data model*. For this additional reason, Applicants respectfully submit that the Office Action fails to state a *prima facie* case of obviousness against their pending claims.

<u>The Office Action Misinterprets the Teachings of the Raman & Batres</u>
<u>Patents, and the Combination of Patents Fails to Disclose Applicants'</u>
<u>Claimed Invention:</u>

Initially, Applicants respectfully submit that the Office Action has misinterpreted the teachings of Raman when applying those teachings to the claims at issue. As outlined above, Applicants' recited invention is a mechanism for manipulating information *from a source data model* and creating a target data model. This mechanism includes *a template module* which has a directive to extract and manipulate selected data of the source data model, and *a template processing module* to process a directive contained in the template module. The template processing module includes a component to generate a first Document Object Model tree and a second Document Object Model tree, each tree being for the specific reason characterized in the independent claims. In comparison, the "public methods" of the Raman patent are cited in the Office Action for allegedly teaching: (1) a template module; (2) a template processing module; (3) a first Document Object Model tree for navigating the template module to manipulate the source data model and create a target data model; and (4) a second Document Object Model tree for navigating the source data model. Applicants recognize that Batres is cited in the Office Action for a teaching of a generic Document Object Model tree, but the Office Action appears to suggest that the particular first and second DOM trees recited by Applicants relate to the public methods of Raman. Such a conclusion is respectfully, but most strenuously, traversed.

The "public methods" of Raman comprise routines for processing information. In comparison, the "template module" of Applicants' independent claims is itself a template or document, which includes a directive to extract and manipulate selected data of a source data model. This template module is recited in various dependent claims to be expressed in Extensive Markup Language, and is defined according to a Document Type Definition. A Document Type Definition is a descriptive definition of a document. No similar template module is presented by the "public methods" of Raman. Again, Applicants' independent claims recite that the template module includes a directive to extract and manipulate selected data of a source data model. Applicants' descriptive template module is thus clearly distinct from any processing routine such as the public methods described by Raman.

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Further, Applicants recite a "template processing module". This template processing module, which is distinct from the template module, processes the directive contained in the template module. Thus, the template processing module references the template module and processes the directive contained therein. The Office Action again appears to cite the "public methods" of Raman for the template processing module as well.

Still further, Applicants' independent claims recite a first Document Object Model tree *for navigating the template module to manipulate the source data model and create a target data model*, and a component to generate a second Document Object Model tree *for navigating the source data model*. In Applicants' independent claims there are two Document Object Model trees created, each for a different purpose. The first tree facilitates navigating the template module to manipulate the source data model and create a target data model, while the second tree facilitates navigating the source data model. No similar facility is believed taught or suggested by Raman and Batres.

One skilled in the art understands that a Document Object Model (DOM) is a specification for how data (e.g., document objects) or objects (such as: text, images, headers, links, etc.) are to be represented in a Web page (i.e., a document authored in a presentation language). The DOM defines attributes associated with each object in the Web page, and how the objects and the associated attributes may be manipulated. Dynamic HTML (Dynamic Hyper-Text Markup Language) is an authoring language used to create Web pages or documents on the World Wide Web, and relies on a DOM to dynamically change the appearance of Web pages after they have been downloaded to a user's browser. A DOM specifies or defines the logical structure of document and the way a document is accessed or manipulated. Documents authored under HTML or XML (Extensible Markup Language) may contain data, and a DOM may be used to manage or handle the data contained in the HTML or XML authored documents. The contents of the DOM may be logically structured like a tree.

Conventionally, the user (i.e., the person desiring access to document objects contained in a document) does not have any means available to change the visual display of the document objects because the user does not have access to the DOM.

As recognized by the Examiner at the bottom of page 4 of the Office Action, Raman fails to explicitly state the existence of a Document Object Model tree *per se*, let alone a Document Object Model tree *for navigating the template module to manipulate the source data model and create a target data model* as recited by Applicants in the independent claims. The Batres patent is cited for an example of a DOM tree, however, as noted above, Applicants recognize that a DOM tree is a known term of art. The Batres DOM is cited "for enumerates through the DOM elements to determine whether the displayable DOM elements are to be shown or hidden on the selected page." Without acquiescing to this characterization of Batres, it is noted that the characterization does not address the specific functionality of Applicants' independent claims. Specifically, Applicants recite a first DOM tree *for navigating the template module to manipulate the source data model and create a target data model.*

Further, Applicants recite in the amended independent claims a second DOM tree *for navigating the source data model.* No similar facility is provided in Raman and Batres, nor addressed in the Office Action.

An "obviousness" determination requires an evaluation of whether the prior art taken as a whole would suggest the claimed invention taken as a whole to one of ordinary skill in the art. In evaluating claimed subject matter as a whole, the Federal Circuit has expressly mandated that functional claim language be considered in evaluating a claim relative to the prior art. Applicants respectfully submit that the application of these standards to the independent claims presented leads to the conclusion that the recited subject matter would not have been obvious to one of ordinary skill in the art based on the applied patent.

For at least the above-noted additional reasons, Applicants respectfully request reconsideration and withdrawal of the obviousness rejection to the claims presented herewith based upon Raman in view of Batres.

Applicants respectfully submit that the independent claims presented patentably distinguish over Raman in view of Batres. Reconsideration and withdrawal of the obviousness rejection based thereon is therefore respectfully requested.

The dependent claims are believed allowable for the same reasons as the independent claims, as well as for their own additional characterizations. For example, dependent claims 7-9, 11, 12, 17, 22 & 27 recite that the template module is expressed in the Extensive Markup Language, and that the template module is defined according to a Document Type Definition. As noted in the Office Action, the applied references to do not explicitly discuss XML. Applicants agree. However, the Examiner suggests that because Extensive Markup Language is a derivative of SGML, and provides a similar marked-up document, it would have been obvious to one skilled in the art to provide a template module as recited by Applicants in Extensive Markup Language. However, as noted above, Applicants strenuously traverse the characterization of Raman as suggesting the provision of a "template module" characterized as recited in the independent claims presented. The "public methods" of Raman are routines, which are clearly distinct from the template module containing a directive as recited by Applicants.
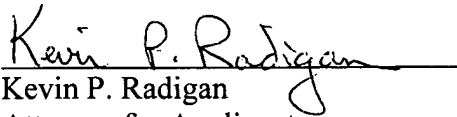
Further, Applicants recite in these dependent claims that the template module is defined according to a Document Type Definition. A Document Type Definition is a term of art which means a particular descriptive document definition. Since this aspect of Applicants' dependent claims is not addressed in the Office Action, it is respectfully submitted that the Office Action fails to state a *prima facie* case of obviousness against these dependent claims. Further, a careful reading of Raman and Batres fails to uncover any discussion of XML *per se*, let alone the provision of a template module as recited by Applicants expressed in XML, and defined according to a Document Type Definition.

For at least these additional reasons, reconsideration and withdrawal of the rejection to these dependent claims is respectfully requested.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicants' undersigned attorney invites the Examiner to telephone him at the number provided.

All pending claims are believed to be in condition for allowance, and such action is respectfully requested.

Respectfully submitted,

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Dated: February 28, 2006.

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